

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TAWANDA HALL; CAROLYN MILLER;
AMERICAN INTERNET GROUP, LLC;
ANTHONY AKANDE; CURTIS LEE;
CORETHA LEE; MARCUS BYERS; and
KRISTINA GOVAN; and all those similarly
situated in the City of Southfield,

Plaintiffs,

Case No.: 20-cv-12230-PDB-EAS
Hon. Paul D. Borman
Mag. Judge Elizabeth A. Stafford

vs.

OAKLAND COUNTY TREASURER
ANDREW MEISNER, in his official and individual
capacities; OAKLAND COUNTY; SOUTHFIELD
NEIGHBORHOOD REVITALIZATION
INITIATIVE, LLC; CITY OF SOUTHFIELD;
FREDERICK ZORN, in his official and individual
capacities; KEN SIVER, in his official and individual
capacities; SOUTHFIELD NON-PROFIT HOUSING
CORPORATION; HABITAT FOR HUMANITY
OF OAKLAND COUNTY, INC.; SUSAN
WARD-WITKOWSKI, in her former official and individual
capacities, GERALD WITKOWSKI, in his official and individual
capacities, TREASURER IRVIN LOWENBERG, in his official
and individual capacities; MITCHELL SIMON; and E'TOILE LIBBETT,

Defendants.

**EXHIBIT LIST TO
DEFENDANTS, SOUTHFIELD NON-PROFIT HOUSING
CORPORATION, SOUTHFIELD NEIGHBORHOOD REVITALIZATION
INITIATIVE, LLC, MITCHELL SIMON AND E'TOILE LIBBETT'S
BRIEF IN SUPPORT OF MOTION TO DISMISS COMPLAINT**

- Exhibit 1: Operating Agreement of Southfield Neighborhood Revitalization Initiative, LLC.
- Exhibit 2: *Anderson v. Co. of Wayne*, No. 10-13708, 2011 WL 2470467 (E.D. Mich., June 20, 2011)
- Exhibit 3: Order on Motion for Summary Disposition
Hayes, et al. v. Oakland County Treasurer's Office, et al.
Oakland County Circuit Court Case No. 2017-157366-CZ
- Exhibit 4: Verified Petition for Reinstatement of Title
Debbie Byers v. Oakland County Treasurer, et al.
Oakland County Circuit Court Case No. 2019-172083-CZ
- Exhibit 5: Opinion and Order Granting Summary Disposition
Debbie Byers v. Oakland County Treasurer, et al.
Oakland County Circuit Court Case No. 2019-172083-CZ
- Exhibit 6: Debbie Byers Appeal Packet
Debbie Byers v. Oakland County Treasurer, et al.
Michigan Court of Appeals Case No. 350277
- Exhibit 7: Order Denying Appeal
Debbie Byers v. Oakland County Treasurer, et al.
Michigan Court of Appeals Case No. 350277
- Exhibit 8: Adversary Complaint
In re Debbie S. Byers, Case No. 20-48373-mar, ECF No. 48
Debbie S. Byers v. [SNRI and OCT], Adversary Case No. 20-04385-mar, ECF No. 1.
- Exhibit 9: Deed to 21666 Hidden Rivers Drive
Liber: 40534, Page: 530, Oakland County Records.
- Exhibit 10: Judgment of Divorce
Debbie Sue Byers v. Marcus Maurice Byers, Sr.
Oakland County Circuit Court Case No. 16-842430-DO.
- Exhibit 11: *Rafaeli, LLC v. Oakland Co.*
No. 156849, 2020 WL 4037642 (Mich., July 17, 2020)